

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

In re: :
: Case No. 10-60074
GREGORY F. GORALNIK and :
ANTONINA M. GORALNIK, : Chapter 11
: Debtors. : Judge Brizendine
:

APPLICATION TO EMPLOY PAUL REECE MARR, P.C.
AS ATTORNEYS FOR DEBTOR IN POSSESSION

COME NOW Gregory F. Goralnik and Antonina M. Goralnik (collectively, "Debtors"), as debtors in possession in the above-captioned bankruptcy case, and hereby apply to this Court for authority to employ the law firm of Paul Reece Marr, P.C. (the "Law Firm") as their bankruptcy attorneys. In support thereof the Debtors respectfully represent as follows:

1. On January 2, 2010 ("Petition Date"), Debtors filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Code (the "Bankruptcy Code"). In accordance with §§1107(a) and 1108 of the Bankruptcy Code, Debtors continue to manage their affairs as debtor in possession. To date, no official committee of unsecured creditors has been appointed pursuant to section 1102 of the Bankruptcy Code.

2. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue of Debtors' chapter 11 case in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. By this application, Debtors request that this Court enter an Order authorizing the Debtors to employ the Law Firm as their bankruptcy counsel pursuant to 11 U.S.C. §327(a). The Debtors have selected the Law Firm, attorneys duly admitted to practice before this Court, because it has considerable experience in bankruptcy, insolvency, corporate reorganization, and debtor/creditor relations and it is well qualified to represent the Debtors in this proceeding.

4. The professional services that the Law Firm is to render include: (a) Providing Debtors with legal advice regarding their powers and duties as debtors in possession in the continued operation and management of their affairs; (b) Preparing on behalf of the Debtors the necessary applications, answers, orders and other legal papers pursuant to the Bankruptcy Code; and (c) Performing all other legal services in the Chapter 11 bankruptcy proceeding for Debtors which may be reasonably necessary.

5. To the best of Debtors' knowledge, the Law Firm has no connection with Debtors, their creditors, or any other party in interest herein, their respective attorneys and accountants, the United States Trustee, or any person employed in the office of the United States Trustee that would preclude it from representing Debtors in this Chapter 11 case, and the Law Firm represents no interest adverse to the estate with the respect to any matter on which the Law Firm is to be employed by Debtors.

6. Debtors desire to employ the Law Firm under a general retainer because of its extensive legal experience, with all compensation paid to the Law Firm subject to approval by the Court after the filing of an Application pursuant to 11 U.S.C. §331. The Law Firm has filed its Bankruptcy Rule 2016(b) disclosure of fees contemporaneously with the filing of this Application.

7. The Law Firm has disclosed to Debtors the hourly fees currently applicable to the professional services to be rendered it as follows: Paul Reece Marr, Esq. \$295.00 per hour; Paralegal \$110.00 per hour. Said fees may be adjusted in the ordinary course of business no more than annually.

8. The aforementioned disclosure of fees is made in an effort to allow the Court to make its determinations as to the reasonableness of the attorney fees charged by the Law Firm. The Debtor has been made aware that the fees charged by the Law Firm are based upon its extensive experience in bankruptcy, insolvency, corporate reorganization and debtor/creditor law

governed by the twelve factors set out in Johnson v. Georgia Highway Express, 488 F.2d 714, 717-19 (5th Cir. 1974).

WHEREFORE, Debtors pray that they be authorized to employ and appoint the Law Firm to represent them as debtors in possession in this bankruptcy case under Chapter 11 of the Bankruptcy Code with all compensation paid or to be paid the Law Firm being subject to Court approval after notice and hearing, and that they have such other and further relief as is just and proper.

Prepared and submitted,
PAUL REECE MARR, P.C.
Debtors' attorneys

By: /s/ Paul Reece Marr

Paul Reece Marr
Georgia Bar No. 471230
300 Galleria Parkway
Suite 960
Atlanta, Georgia 30339
770/984-2255

/s/ Gregory F. Goralnik
Gregory F. Goralnik

/s/ Antonina M. Goralnik
Antonina M. Goralnik

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VERIFIED STATEMENT OF PROPOSED ATTORNEY

I, Paul Reece Marr, hereby make solemn oath under penalty of perjury:

1. I am over the age of eighteen and am competent to make this Verified Statement. All information set forth herein is based upon my personal knowledge, information or belief.

2. I am an attorney and counselor at law, duly admitted to practice in the State of Georgia and in this Court and I am employed by Paul Reece Marr, P.C. as an attorney. I maintain an office for the practice of law at 300 Galleria Parkway, Suite 960, Atlanta, GA 30339. My office telephone number is 770/984-2255.

3. I have no connection with Debtors, their creditors, their respective attorneys and accountants, the United States Trustee, any person employed in the office of the United States Trustee, or any other party in interest herein other than as may be disclosed herein or in the Application. I represent no interest adverse to the debtors in possession or the estate in the matters upon which I am to be engaged for the debtors in possession, and I am a "disinterested person" within the contemplation of 11 U.S.C. Section 101(13).

/s/ Paul Reece Marr
Paul Reece Marr
GA Bar # 471230

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CERTIFICATE OF SERVICE

I, Paul Reece Marr, certify that I am over the age of 18 and that on the below referenced date I served a copy of the attached Application by first class U.S. Mail, with adequate postage prepaid on the following persons or entities at the addresses stated:

James H. Morawetz
Office of the U.S. Trustee
362 United States Courthouse
75 Spring Street, S.W.
Atlanta, Georgia 30303

Gregory F. Goralnik
Antonina M. Goralnik
4305 Dove Point
Duluth, GA 30096

This the 9th day of February, 2010.

/s/ Paul Reece Marr
Paul Reece Marr

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